

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)**

OLES ENVELOPE, LLC, et al.

*

Plaintiffs/Counter-Defendants

*

v.

*

GTD COMPANY, INC., et al.,

*

Civil Action No. WMN 02-2017

Defendants/Counter-Plaintiffs

*

* * * * *

JOINT MOTION TO MODIFY PRETRIAL SCHEDULE

Plaintiffs, Oles Envelope, LLC ("Oles") and Oles Envelope Corporation ("OEC"), and the Defendants, GTD Company, Inc., Harold Robinson and David Oechsle ("Defendants"), by undersigned counsel, hereby move the Court to modify the deadlines provided in the existing Scheduling Order for the following reasons:

1. Documents possessed by Wilmington Trust Bank, Roxborough Manayunk Bank and First Union Bank are important to Plaintiffs' claims and are required to conduct effective depositions of the Defendants and other witnesses.
2. Plaintiffs issued and served subpoenas upon Wilmington Trust Bank and Roxborough Manayunk Bank on or about August 21, 2002.
3. Defendants issued and served a subpoena upon First Union Bank on or about October 29, 2002.
4. Wilmington Trust Bank and Roxborough Manayunk Bank substantially delayed in producing documents pursuant to the subpoenas. The latest document

production was received on February 11, 2003. To date, Plaintiffs believe that the production from the banks is not complete.

5. Settlement conferences were held before Magistrate Judge Gauvey on October 15, 2002 and February 26, 2003. Settlement did not result at either of the settlement conferences.

6. None of the parties will be prejudiced by the proposed modification to the deadlines.

7. For the above reasons, the parties need additional time to complete discovery and request that the deadlines in the Scheduling Order be revised as follows:

Discovery deadline; Status Report – May 16, 2003

Requests for admission – May 16, 2003

Dispositive pretrial motions deadline – June 13, 2003

Response to dispositive pretrial motions – July 14, 2003

Reply regarding dispositive pretrial motions – August 4, 2003

WHEREFORE, the Plaintiffs and the Defendants respectfully request that the Court modify the deadlines in the existing Scheduling Order.

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Attorneys for Defendants,
GTD Company, Inc.,
Harold Robinson and David Oechsle

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this ____ day of March, 2003, a copy of the Joint Motion to Modify Pretrial Schedule was mailed, postage prepaid, to:

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